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16 Counsel for Robins Cloud LLP

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16) Chapter 11
17 and)
18 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
19 COMPANY)
20 Debtors) **DECLARATION OF ROBERT**
21) **BRYSON IN SUPPORT OF MOTION**
22) **FOR ORDER AUTHORIZING**
23) **WITHDRAWAL OF COUNSEL TO**
24) **SHERRY MITCHAM**

25 Affects:

- 26 ☐ PG&E Corporation)
27 ☐ Pacific Gas & Electric Company)
28 ☒ Both Debtors)

29 * All papers shall be filed in the Lead)
30 Case, No. 19-30088 (DM).)
31)

1 **Declaration of Robert Bryson**

2 I, Robert Bryson, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of
5 record for Sherry Mitcham ("Creditor").¹ I am duly admitted to practice law before all courts of
6 the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true
9 and within the scope of my personal knowledge, and if called upon to do so I could and would
10 testify competently to these facts.

11 4. On January 29, 2019, Debtors filed voluntary petitions commencing their
12 bankruptcy cases.

13 5. On October 16, 2019, the Firm filed Proof of Claim No. 30183 on behalf of
14 Sherry Mitcham ("Claim"), seeking damages from the North Bay Fire. Since the filing of the
15 Claim, an irreconcilable difference has developed between Creditor and the Firm. As a result, the
16 Firm notified Creditor that it must withdraw as counsel.

17 6. To the extent that Creditor requests that the Firm turn over any files or
18 information that he is entitled to, the Firm will cooperate and transmit such files.

19 7. The Firm will cause the Motion to be served on all of the addresses provided to
20 the Firm by Creditor, including the following:

21 2810 Porter Creek Road
22 Santa Rosa, CA 95404

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on October 13, 2022.

25 
26 Robert Bryson

27
28 ¹ The Firm retained Grimshaw Law Group, P.C. ("GLG") to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.